

THE LAW OFFICES OF RAMON A. CAMEJO, P.C.

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Attorneys for Plaintiffs, Junior Abreu and Maribel Abreu

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JUNIOR ABREU and MARIBEL ABREU,

Plaintiffs,

vs.

RAHWAY POLICE DEPARTMENT, CITY
OF RAHWAY, DET/SGT. RICHARD LONG,
DET. SHAWN GANLEY, DET. THOMAS
McCOMB, PO GRESHAM, PO MEZEY, JOHN
DOES 1-10 and ABC CORPORATIONS 1-10,
(said names being fictitious designations)

Defendants.

CIVIL ACTION NO.: 2:16-cv-04894-KM-
MAH

**NOTICE OF MOTION TO REINSTATE
PLAINTIFFS' COMPLAINT TO THE
ACTIVE TRIAL CALENDAR**

TO: U.S. District Court for the District of New Jersey
50 Walnut Street
Newark, NJ 07102

John F. Gillick, Esq.
Rainone Coughlin Minchello
555 US Highway One South, Suite 440
Iselin, New Jersey 08830

Attorney for Defendants, Det/Sgt. Richard Long, Det. Shawn Ganley and Det. Thomas McComb

Marc D. Mory, Esq.
Dvorak & Associates
467 Middlesex Avenue
Metuchen, NJ 08840
Attorney for Defendants, P.O. Gresham and P.O. Mezey

Robert F. Renaud, Esq.
190 North Avenue East
Cranford, NJ 07016

PLEASE TAKE NOTICE that the undersigned attorneys for the plaintiff, Junior Abreu, shall apply to the above named Court located at 50 Walnut Street in the City of Newark, New Jersey on July 7, 2023, at 9:00 a.m. or as soon thereafter as counsel may be heard for an Order granting Plaintiffs' motion reinstating the Plaintiffs' Complaint to the active trial calendar and reopening and extending the discovery end date.

PLEASE TAKE FURTHER NOTICE that no arbitration, trial or pretrial conference date has been scheduled.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, the Plaintiffs will rely upon the supporting certification of Ramon A. Camejo, Esq.

Pursuant to R. 27, the undersigned:

- ☒ (X) waives oral argument and consents to disposition on the papers, unless the matter is opposed.
- ☐ () does not request oral argument at this time.
- ☐ () requests oral argument.

A proposed form of Order is annexed.

The Law Offices of Ramon A. Camejo, P.C.
Attorneys for Plaintiffs

By:



RAMON A. CAMEJO

Dated: June 14, 2023